



DEPARTMENT OF VETERANS AFFAIRS
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April 14, 2006

United States Environmental Protection Agency
Water Technical Unit
P.O. Box 8127
Boston, MA 02114

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Subject: Storm Water Management Plan, Year Three (2005 – 2006) Annual Report for the Northampton Veterans Administration Medical Center

In accordance with the reporting requirements set forth in Part IV(F) of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s), the Northampton Veterans Administration Medical Center VAMC has prepared this report summarizing progress toward measurable goals and implementation of the Best Management Practices (BMPs) described in the VAMC Storm Water Management Program.

Public Education and Outreach

Because the VAMC is a facility rather than a municipality, the definition of "public" has a much more limited scope. For the purpose of the SWMP, the term "public" has been interpreted as VAMC employees, patients, visitors, and on-site contractors. Educating the public about non-point source pollution and the functions of the storm drain system helps establish a facility-wide initiative to protect local surface waters.

- **BMP 1.3.1 – Public Education Materials**

The VAMC has posted a brief summary of the VAMC Storm Water Management Program on the intranet webpage and identified the GEMS Coordinator as the primary point of contact for additional information. The VAMC has also begun to prepare a one-page storm water brochure that will be distributed to employees, patients, and visitors during the Medical Center's annual Informatics Expo in 2006. These brochures will also be made available to visitors at the Visitor Information Desk located in the lobby of Building 1.

- **BMP 1.3.2 – Training Programs**

Many VAMC employees attend regular on-site training programs for safety topics such as Oil Spill Prevention Control and Countermeasure (SPCC), OSHA safety

awareness, and other operational health and safety topics. During Year One and Year Two of permit coverage the VAMC has presented a brief storm water awareness program in conjunction with these existing training programs. During Year Three the VAMC has retained the services of an outside contractor to develop and present in-depth implementation training that will clearly identify responsibilities and schedules for completion of BMPs. The Storm Water Management Program Implementation Training will be conducted during Year Four.

- **BMP 1.3.3 – Storm Drain Identification Program**

During Year One and Year Two of permit coverage the VAMC implemented a storm drain identification program. This program consisted of developing an up-to-date map of the facility storm water drainage system; identifying and numbering all catch basins and outfalls on-site; and attaching stainless steel markers to each structure that read "No Dumping, Drains to River." During Year Three the VAMC has continued to update the drainage system map and has replaced markers that were damaged or removed by winter road maintenance activities.

Public Participation/Involvement

Public participation accomplishes several objectives, it invokes a feeling of pride and accomplishment among those involved; educates the public on the importance of good storm water management practices; and makes teachers of the volunteers, promoting public education beyond the individual event. As noted above, for the purpose of the SWMP, the term "public" has been interpreted as VAMC employees, patients, visitors, and on-site contractors.

- **BMP 2.3.1 – Annual "Clean the Stream" Program**

The VAMC had anticipated recruiting volunteers to help the VAMC to "Clean the Stream" on an annual basis. This would be an annual one day event to raise awareness by coordinating volunteers to walk the facility outfalls and ponds to remove debris, and raise awareness about the impact of facility operations on the surrounding environment. Volunteer turnout for the event was very poor and due to ongoing maintenance and upkeep by the Grounds Department, there was very little debris to remove. The annual review of the Storm Water Management Program has determined that this BMP offers minimal benefit to the overall implementation of the program and other opportunities for Public Participation are being evaluated for implementation during Year Four.

- **BMP 2.3.2 – Partner/Support the City of Northampton's Storm Water Management Program**

During Year One of permit coverage the VAMC initiated contact with the Storm Water Management Program Coordinator for the City of Northampton. During Year Two and Year Three the VAMC has maintained an ongoing partnership with the City Coordinator.

- **BMP 2.3.3 – Call Center**

The GEMS Coordinator is the designated individual responsible for implementation of the Storm Water Management Program. As indicated on the intranet webpage, interested parties may communicate their suggestions, ideas, or observations directly to the GEMS Coordinator by calling the Facility Management Program office. Contact information for the GEMS Coordinator is also included in the one-page storm water brochure that will be distributed during the annual Informatics Expo and at the Information Desk in Building 1.

Illicit Discharge Detection and Elimination

The VAMC's existing program for detecting or eliminating illicit discharges within its storm drain system has been removing illicit discharges whenever they are found during the course of system operation and maintenance. The BMPs developed for the Storm Water Management Program are designed to improve detection and establish procedures for elimination.

- **BMP 3.4.1 – Storm Drain Map**

The map of the facility storm water drainage system developed for the Storm Drain Identification Program is updated as changes occur.

- **BMP 3.4.2 – Storm Drain Identification Program**

The VAMC policy entitled "Storm Water Pollution Plan" was issued during Year Two of permit coverage to identify measures required for the elimination and reduction of pollution associated with storm water discharges. The annual review of the Storm Water Management Program has determined that the existing policy lacks specific prohibitions and delegation of roles and responsibilities. During Year Four, the VAMC will revise the policy and communicate the changes through the Public Education and Outreach Training Programs.

- **BMP 3.4.3 – Illicit Discharge Detection Program**

The VAMC storm water policy includes procedures for quarterly compliance inspections of the system outfalls to identify possible cross connections and dry weather flow. However, the annual review of the Storm Water Management Program determined that the policy failed to adequately designate responsibility and schedules for completion. To address these deficiencies, inspections are currently being conducted by Facility Management personnel and the storm water policy will be revised to accurately reflect the current inspection procedures.

- **BMP 3.4.4 – Illicit Discharge Elimination Program**

The revisions to the storm water policy will include specific prohibitions and procedures for elimination of identified illicit discharges.

- **BMP 3.4.5 – Education Program**

The in-depth implementation training that will be presented during Year Four will highlight the specific prohibitions and procedures for detection and elimination of illicit discharges.

Construction Site Runoff Control

All construction activities at the VAMC are contracted through FMS. Rules and regulations addressing Construction Site Runoff Control through erosion and sedimentation control techniques have been developed and will be incorporated directly into the language of construction contracts for activities that result in a land disturbance of greater than or equal to one acre. During the past three year of permit coverage, the VAMC has not conducted any construction projects that exceed these thresholds.

- **BMP 4.2.1 – Regulatory Controls**

The Facility Management Program Policy No. 56 entitled “Construction Site Runoff Control” was issued during Year Two of permit coverage to establish required procedures to control runoff from construction activities. These storm water control measures are designed to be included in construction specifications.

Post-Construction Site Runoff Control

As noted above, the VAMC has not conducted any construction projects that require the implementation of Facilities Management Policy No. 56. However, the policy does include procedures for selection of structural storm water controls.

Pollution Prevention/Good Housekeeping

The efforts made by the VAMC to operate and maintain facility roads, drains, and equipment have and will continue to provide a good example to VAMC employees, patients, visitors, and on-site contractors.

- **BMP 6.3.1 – Employee Training Program**

As noted above, many VAMC employees attend regular on-site training programs for safety topics such as Oil Spill Prevention Control and Countermeasure (SPCC), OSHA safety awareness, and other operational health and safety topics. During Year Four the VAMC will augment these existing programs by conducting Storm Water Management Program Implementation Training

- **BMP 6.3.2 – Waste Oil Recycling Program**

Waste oil generated throughout the facility is collected, managed, and recycled in accordance with the procedures set forth in the Oil SPCC Plan and Facilities Management Program Policy No. 57.

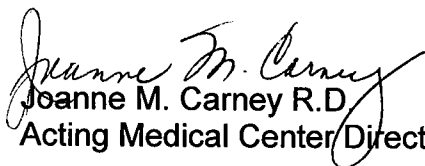
- **BMP 6.3.3 – Catch Basin Cleaning Program**

The VAMC maintains a contract with a vendor to perform annual cleaning of all facility catch basins. In accordance with MA DEP regulations, policies and guidance, the catch basin cleanings are classified as solid waste and are disposed of at a landfill that is permitted by MA DEP to accept solid waste. Quantities of material removed are currently being tracked through project invoices.

- **BMP 6.3.4 – Street Sweeping Program**

VAMC currently uses a salt and sand mixture for road de-icing during winter months. As the impacts of road salt and sand use on an ecosystem are complex, and often site-specific, during Year Four, the VAMC will be reviewing and monitoring its use of salt and sand for de-icing with the intent of developing a policy aimed at helping to reduce environmental impacts arising from the use of this mixture on its roads. While employees from the Grounds Department conducts periodic street sweepings on an as needed basis using the two small sweepers owned and maintained by the VAMC, during Year Four the VAMC will develop a policy on its street sweeping operations as a means to enhance the timing and frequency of these cleanings.

If you have any questions, or require further information with regard to this report, please contact Stephen Quigley, GEMS Coordinator at (413) 584-4040 Extension 2171.


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